



December 11, 2006

Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, DC 20054

**EX PARTE COMMENT: in re Ip-Relay**

**In the Matter of Telecommunications Relay Services and Speech-to-Speech Services  
for Individuals with Hearing and Speech Disabilities, CGB Docket No. 03-123**

Dear Commission:

I am filing this ex parte notice as follow-up to some comments made to several staff in the Consumer & Governmental Affairs Bureau<sup>1</sup> in regard to concerns about persons who abuse relay services, that is, persons using inappropriately the Ip-Relay form of Telecommunications Services (TRS). The overriding concern for AAPD<sup>2</sup> is with the integrity of TRS, our nation's means of making telephony accessible for persons with hearing disabilities and for persons with speech disabilities.

In my comments, I recommended that the FCC create and disseminate a Consumer Alert or Consumer Advisory or Fact Sheet in plain English that addresses scamming/harassment/intimidation by persons misusing IP-relay. While Public Notices (PNs) are useful, the average reader often does not have the time to read through an FCC PN that is generally a legal discussion. The audience that should be the target for this Fact Sheet should be small business operators and their staff, and persons unfamiliar with relay generally, who are the principal targets of scammers/abusers, in my observation. This Fact Sheet should be widely and easily available on the FCC web site. I also recommend that the FCC ask the FTC to have a similar Fact Sheet, based on the FCC one since consumers go to both agencies routinely for information of this sort. The FCC and FTC Fact Sheets should have the usual action steps and refer people to the Internet Crime

---

<sup>1</sup> Meeting held December 7, 2006 with Monica DeSai, Bureau Chief, Jay Keithley, Deputy Bureau Chief, Tom Chandler, Chief, Disabilities Rights Office (DRO), Greg Hlibok, Attorney (DRO), electronic communication sent December 1, 2007 to Tom Chandler and Jay Keithley, and phone call December 1, 2007 with Tom Chandler.

<sup>2</sup>AAPD is the largest national nonprofit cross-disability member organization in the United States, dedicated to ensuring economic self-sufficiency and political empowerment for the more than 51 million Americans with disabilities. AAPD works in coalition with other disability organizations for the full implementation and enforcement of disability nondiscrimination laws, particularly the [Americans with Disabilities Act](#) (ADA) of 1990 and the Rehabilitation Act of 1973, and other statutes.

Complaint Center (IC3), the FBI and National White Collar Crime Center. The web site there offers a consumer online complaint filing form at <http://www.ic3.gov/>

I also believe that abuse of this form of relay should be seen within a larger context, i.e., abuse and fraudulent use of systems that use IP or the internet. This is a general problem and IP-Relay is just one manner in which this type of activity occurs as part of an overall problem. There may be solutions based in seeing the problem from this angle. I also believe that there could be more technological solutions by the TRS providers and encourage exploration and implementation of these.

Sincerely,

**Jenifer Simpson**

Jenifer Simpson  
Senior Director, Telecommunications and Technology Policy  
AAPD  
1629 K Street N.W., Suite 503  
Washington, DC 20006